



January 24, 2025

VIA ECF

The Honorable Robyn F. Tarnofsky
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Abuladze, et al. v. Apple Commuter, Inc., et al.*,
Case No.: 1:22-cv-08684-GHW-RFT

Dear Judge Tarnofsky:

We represent Defendant Edison Management Co. LLC in the above-referenced action and write to respectfully inform the Court that Plaintiffs and Hotel Defendants¹ have agreed to move forward with the settlement of Plaintiffs' individual and class claims against Hotel Defendants as outlined in the Parties' term sheet.² Accordingly, Hotel Defendants do not intend to make a motion to enforce as contemplated in the Court's January 10, 2025 Order (ECF No. 280).

When it is determined whether Defendants Biren Shah and Apple Commuter, Inc. will also be included in this resolution, either by agreement or upon a successful resolution to Plaintiff's motion to enforce, the parties will finish documenting the agreement and submit it to the Court for approval.

¹ The Hotel Defendants include: (a) Edison Management Co. LLC a/k/a Edison Hotel; (b) 237 West 54 Owner LLC a/k/a Hilton Garden Inn (54); (c) HHLP 52 Lessee LLC a/k/a Hilton Garden Inn (52); (d) Brisam Management DE LLC a/k/a Holiday Inn Chelsea; (e) Patel Khanbudhai/Comfort Inn a/k/a Comfort Inn Chelsea/Heritage Hotel; (f) Wolcott Hotel Co. a/k/a Wolcott Hotel; (g) S&G Hotel Corp. a/k/a St. James Hotel; (h) Eros Management & Realty LLC a/k/a TRYP by Wyndham; and (i) Executive Le Soleil New York LLC a/k/a Executive Hotel Le Soleil New York.

² The parties intend to continue to negotiate the draft settlement agreement circulated by Plaintiffs and attached as Exhibit E to the Affidavit of Mr. Haroutunian in Support of Plaintiff's Motion to Enforce (ECF No. 283-5) to ensure it reflects the Term Sheet and also includes sufficient detail to properly administer the class settlement.

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Thank you for the Court's continued attention to this matter.

Respectfully submitted,

/s/

George D. Vallas, Esq

cc. All Counsel of Record (via ECF)